

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA §  
§  
v. § No. 6:18-CR-46  
§ (Judge JRG-KNM)  
SHELLY K. HUNTER §

**ELEMENTS OF OFFENSE**

The defendant is charged in Count One of the information with interstate transportation of stolen funds, in violation of 18 U.S.C. § 2314. The essential elements which must be proven to establish this violation are:

1. The defendant transported or caused to be transported in interstate commerce, money and funds, as described in the information, from Texas to Illinois;
2. At the time of such transportation, the defendant knew that the property was stolen, converted, or taken by fraud; and
3. The money and funds had a value of \$5,000 or more.

The word "stolen" includes all wrongful and dishonest takings of property with the intent to deprive the owner of rights and benefits of ownership temporarily or permanently. The phrase "taken by fraud" means to deceive or cheat someone out of property by means of false or fraudulent pretenses, representations, or promises.

JOSEPH D. BROWN  
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/s/ L. Frank Coan, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this pleading has been served on  
counsel for the defendant via the Court's CM/ECF system on this the 16th day of  
July, 2018.

*/s/ L. Frank Coan, Jr.*

L. Frank Coan, Jr.

